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Services, Inc., Jerry Mascolo, Leondra Coleman,
and Dawn Cockrum*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PATSY JAY,

Plaintiff,

v.

GRAND MANAGEMENT SERVICES, INC.,
EVERGREEN GARDENS LIMITED
PARTNERSHIP, JERRY MASCOLO,
LEONDRA COLEMAN, and DAWN
COCKRUM,

Defendants.

Case No. 3:23-cv-00656-SI

**STIPULATED MOTION TO EXTEND
DEADLINES**

LR 7-1 CERTIFICATION

The parties have conferred and jointly request the court extend the deadlines set forth in the current scheduling order (ECF 11) for a period of 90 days. This is the first request for an extension, and the parties make this request upon good cause.

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STIPULATED MOTION

The parties request a 90-day extension of the current case schedule as follows:

	Current Deadline	New Deadline
Discovery Cut Off	January 31, 2024	April 30, 2024
Expert Disclosures	March 6, 2024	June 4, 2024
Expert Discovery Cut Off	April 17, 2024	July 16, 2024
Joint ADR Report	May 31, 2024	August 29, 2024
Dispositive Motions	May 31, 2024	August 29, 2024

Good cause exists for the extension. Despite diligent efforts, the parties will not be able to complete discovery by the current discovery cut off of January 31, 2024. While some paper discovery has been exchanged, it is not complete. Depositions have been requested but not yet taken.

In addition, Judge Michael Mosman just set an expedited trial in a matter being handled by counsel for defendants Grand Management Services, Inc. Jerry Mascolo, Leondra Coleman and Dawn Cockrum, (*Estate of Thomsen v. NaphCare, Inc., et al*, Case No. 3:19-cv-00969-MO). This matter has been pending since 2019. In December 2023, the defendants were notified that the plaintiff had less than six months to live, necessitating an expedited trial. While the trial is not until May 7, 2024, Judge Mosman set an abbreviated briefing schedule for objections to a dispositive order of the Magistrate and set the summary judgment deadline for February 2, 2024 (no previous deadline had been set for summary judgment prior to Judge Mosman's order of January 4, 2024). Time that could otherwise be allocated to this matter will, by necessity, be focused on Judge Mosman's matter.

In addition, the parties have agreed to submit this matter for a judicial settlement conference prior to the expiration of the proposed April 30, 2024, discovery cutoff date. This extension will give the parties time to complete the discovery necessary to fully evaluate their respective positions and ensure the success of the judicial settlement conference.

The parties agree that good cause exists for extending the pending deadlines according to the above schedule. This Motion is based on good cause and is not submitted solely for the purposes of delay.

IT IS SO STIPULATED this 10th day of January 2024.

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